

LINDA LINGLE
GOVERNOR OF HAWAII



CHIYOME L. FUKINO, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAI'I
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAI'I 96801-3378

In reply, please refer to:
File: EHA/HEER Office

07-195-JP

March 23, 2007

Michael B. Phelps, P.E.
Senior Project Manager
PARSONS
1132 Bishop Street, Suite 2102
Honolulu, HI 96813

Subject: Concurrence letter for the *Final Pesticide Soils Management Plan, Ohana Military Communities, LLC, Public-Private Venture Housing – Hawai'i*, dated February 2007 and prepared by Parsons.

Dear Mr. Phelps:

The Hawai'i Department of Health (HDOH), Hazard Evaluation & Emergency Response Office (HEER Office) has reviewed the Subject *Final Pesticide Soils Management Plan* and concur with the plan's details to address pesticide-impacted soils at identified Department of Navy and Marine Corps housing communities in Hawai'i. This concurrence includes the use of the proposed Tier 2 EALs (which incorporate cumulative risk considerations for multiple contaminants) for project sites. Thank you again for being responsive to previous HEER Office comments in developing the final soils management plan.

As noted in past comments and discussion, the HEER Office did not participate in an initial review of the soil sampling strategy that was developed and used for the housing communities discussed in the *Final Pesticides Soils Management Plan*. Consequently, additional discussion and justification was requested to support interpretation of soil sampling data for those neighborhoods where remediation was not determined to be necessary (e.g. Manana-Marines neighborhood). Based on the additional information and justification provided for the Manana-Marines neighborhood, the HEER Office agreed with Parsons that estimated risks did not warrant soils remediation for this neighborhood.

If any additional soil sampling should occur in housing communities where pesticide exposures are being evaluated, the HEER Office recommends that the planned data quality objectives and soil sampling strategy be reviewed by the HEER Office before implementation. For neighborhoods that have already been sampled and

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determined not to need soil remediation, please consult with the HEER Office regarding sample data interpretation and risk estimates (like the Manana-Marines neighborhood noted above).

Sincerely,

A handwritten signature in black ink, appearing to read "John Peard".

John Peard, Project Manager

cc: Kay Chang, HMC/Forest City Hawaii
Loren Lund, PARSONS, Senior Toxicologist